

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL NO. 11-068 (JBS)

v. :

BRANDON ANTHONY : NOTICE OF MOTION

TO: FRANCES C. BAJADA
Assistant United States Attorney
970 Broad Street, Suite 700
Newark, NJ 07102

COUNSEL:

PLEASE TAKE NOTICE that the defendant, Brandon Anthony, through his attorney, Maggie F. Moy, Assistant Federal Public Defender, shall move before the Honorable Jerome B. Simandle, United States District Judge, at the United States Courthouse, Camden, New Jersey, at such date and time as the Court may schedule, for the following relief:

1. Ordering the government to disclose the identity of the confidential informant and other critical information as it relates to said informant;
2. Ordering an evidentiary hearing to determine the validity of the search warrant of Mr. Anthony's residence;
3. Ordering the government to provide the defendant with all evidence that would exculpate him or mitigate his culpability; and

4. Ordering the government to provide a written summary of the testimony of any experts the government intends to introduce at trial, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(E); and Federal Rule of Evidence 702, 703, 705; and
5. Ordering the government to disclose prior to trial any prior evidence it intends to offer pursuant to Federal Rules of Evidence 404(b); and
6. Permitting the defendant to file any additional motions that may become necessary related to the disclosure of additional items by the government.

In support of these motions, the defendant relies upon the enclosed Memorandum of Law.

Respectfully submitted,

s/ Maggie F. Moy

MAGGIE F. MOY
Assistant Federal Public Defender
Attorney for Defendant
Brandon Anthony

DATED: January 11, 2012

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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v. :

BRANDON ANTHONY : CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing defendant's Notice of Motion and Memorandum of Law in Support of defendant's Pretrial Motions were served via electronic filing upon counsel for the government, Assistant United States Attorney Frances C. Bajada, on January 11, 2012.

Respectfully submitted,

s/ Maggie F. Moy

MAGGIE F. MOY
Assistant Federal Public Defender
Attorney for Defendant
Brandon Anthony

DATED: January 11, 2012